

Rhonshawn Jackson,
Plaintiff

: C.A. No. 16-133ERIE

FILED

NOV - 9 2020

V.

: District Judge Baxter

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

PA Dept. of Corr.,
et al;
Defendants

:

INTERROGATORY ANSWERS THAT PLAINTIFF WILL INTRODUCE AT TRIAL, NOVEMBER 16, 2020:

Per this Court's Order, plaintiff will now submit the interrogatory answers from SCI- Albion's Grievance Coordinator, Mrs. Roni Martucci-Irwin, & interrogatory answers from SCI-Albion's Superintendent, Micheal Clark:

PLAINTIFF'S REASON FOR RONI MARTUCCI-IRWIN'S INTERROGATORY ANSWERS:

Plaintiff is introducing Mrs. Martucci-Irwin's interrogatory answers because her answers will show a reasonable jury that it is not the job of the inmate to ensure that a grievance officer that is assigned to our grievances, answer them in a timely manner, & their untimeliness is out of our power & or control.

I also want the jury to hear directly from her that if a grievance response is sent to her from a grievance officer & it is in accordance with department policy, then per policy, she dates & initials those grievance responses before they are entered into the department record. I also want her to let the jury know, just like she stated in her interrogatory answers that she always dates & initials the responses that she receives that are in accordance with policy, so that the jury will know that any responses that were entered into the department record that does not have is not dated & initialed by her, is not an approved response & could be entered into the record at any time.

I want the jury to know that this is a obstructive tactic that defendant correctional officers utilize against inmates in order to obstruct prisoners from fully exhausting grievances that were filed in good faith, & this is also a method employed by defendant correctional officers to circumvent liability. Mrs Martucci-Irwin's interrogatory answers & her testimony at my trial, will reveal how DOC employees have been obstructing inmate grievances statewide for decades, & misleading the courts with fraudulent documentation to make it appear as though DOC defendants actually responded to an inmates grievance in a timely manner, when on the surface, if the courts actually took a closer look at the grievance responses by DOC defendants, they would discover that these responses do not have dates they were entered or the initials of a Grievance Coordinator, which means that it could be entered at anytime without the inmate even knowing.

Mrs Martucci-Irwin's interrogatory answers will not only reveal this obstructive tactic that is utilized by DOC defendants that prisoners have no way to counter, her testimony & answers to her interrogatories will also reveal how DOC defendants utilize unauthorized forms to submit untimely grievance responses due to the fact that they can't get a honest Grievance Coordinator to enter a untimely response on a authorized form that should've been submitted timely.

Mrs Martucci-Irwin's interrogatory answers & testimony is paramount & also epic to plaintiff's case because these are the exact violations & obstructive tactics that was employed against plaintiff,& the plaintiff is just one of many that this tactic has successfully been utilized against,& a reasonable jury needs to know the obstructive tactics that we fight against just to get our grievances concerning abuses/violations that we filed in good faith fully exhausted,& they need to know just how far the DOC defendants will go just to obstruct/circumvent liability.

PLAINTIFF'S REASON FOR MICHEAL CLARK'S INTERROGATORY ANSWERS:

Plaintiff is introducing Mr. Clark's interrogatory answers because his answers will show a reasonable jury that he is defendant O'Brien's Supervisor,& Mr. Clark will reveal to the jury that per DOC policy, when a inmate goes on a "one day writ", his cell contents is not supposed to be touched, destroyed, confiscated, or removed from his cell unless its an emergency situation & even then, the inmate's property is to be inventoried & a DC-153 Inventory Items Receipt is supposed to be filled out & signed by two officers,& these two officers are supposed to put a notation on the DC-153 stating why my property was packed in my absence. My property is then supposed to be placed in the Lieutenants office until the inmate returns to the jail.

As Superintendent & defendant O'Brien's Supervisor, Mr. Clark will be able to reveal to a reasonable jury that defendant O'Brien is well aware of this DOC policy & Mr. Clark will also reveal to a reasonable jury that he doesn't know why defendant O'Brien would intentionally just destroy legal & personal property of that magnitude without justification, as he stated in his answers in his interrogatories.

Mr. Clark's answers will also reveal to a reasonable jury that their is no legal or logical justification as to why my legal & personal property of that magnitude was destroyed, or how it could've just disappeared into thin air like that never to be seen by anyone again. Mr Clark's answers & testimony will also prove to a reasonable jury that this is not an act that defendant O'Brien would do the same again if the situation reoccurred & Mr Clark's testimony will also reveal to a reasonable jury that, outside of the retaliation against me, their is no other logical or legitimate reason as to why defendant O'Brien would knowingly destroy legal & personal property of this magnitude, belonging to another inmate who is at a court proceeding.

Plaintiff would also like to reserve the right to amend this Discovery Designation upon receipt of the Defendants Discovery Designation.

Dated: October 30, 2020.

Respectfully Submitted,

/s/ _____

I, Rhonshawn Jackson, Pro Se, hereby certify that on October 30, 2020, I caused to be served by U.S. First Class Mail & Postage, the following document titled "Interrogatory Answers that Plaintiff will Introduce at Trial", to the names & address below. I sent a true & exact copy:

Scott A. Bradley
Timothy Mazzocca
Office Of The Attorney General
1251 Waterfront Place
Mezzanine Level
Pittsburgh, Pa 15222

Dated: October 30, 2020.

Respectfully Submitted,

/s/


Rhonshawn Jackson Pro Se